IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS EASTERN DIVISION

CYNTHIA L. MERLINI,) Ciril A -4i No. 1.17 10510 NIMC
Plaintiff,) Civil Action No. 1:17-cv-10519-NMG
v.) MOTION FOR ADMISSION
CANADA,) PRO HAC VICE OF ATTORNEY) LAURA A. SEFERIAN
Defendant.	}

Defendant Canada, pursuant to Local Rule 83.5.3, hereby moves for the *pro hac vice* admission of Laura A. Seferian, an attorney at Dentons US LLP, with offices at 1900 K Street NW, Washington DC 20006. Such admission is for the purpose of this case only.

As grounds for this motion, and as set forth in the attached Affidavit of Laura A. Seferian, Defendant Canada states as follows:

- 1. Ms. Seferian is duly admitted and licensed to practice law in the state of Illinois, the state of Virginia, the District of Columbia, in the U.S. Court of Appeals for the First Circuit, and in the United States District Court for the Eastern District of Virginia.
- 2. There are no disciplinary proceedings pending against Ms. Seferian as a member of the bar in any jurisdiction.
- 3. Ms. Seferian is familiar with the Local Rules for the United States District Court for the District of Massachusetts.
- 4. Defendant Canada has requested that Ms. Seferian represent it in this action before this Court. Ms. Seferian has already represented Canada in this proceeding in appellate proceedings before the First Circuit and the Supreme Court.

5. Plaintiff Cynthia L. Merlini assents to this motion.

WHEREFORE, Defendant Canada respectfully requests that this Court grant this motion and permit Laura A. Seferian to enter his appearance *pro hac vice* in the above-captioned matter.

Dated: June 12, 2020 Respectfully submitted,

DEFENDANT CANADA,

By its Attorneys,

/s/ Tony K. Lu

Tony K. Lu (BBO# 678791) DENTONS US LLP One Beacon Street, Suite 25300 Boston, MA 02108-3107

Tel: (617) 235-6817 Fax: (617) 235-6899 tony.lu@dentons.com **CERTIFICATION OF LAURA A. SEFERIAN**

Pursuant to this Court's Rule 83.5.3(e)(3), I, Laura Arshalous Seferian, hereby certify as

follows:

1. I am not a member of the bar of this Court or of the Massachusetts bar. I am

seeking admission pro hac vice to this Court to represent Defendant Canada in Merlini v.

Canada, No. 1:17-cv-10519-NMG. I have previously represented Canada in this proceeding on

appeal before the U.S. Court of Appeals for the First Circuit and the U.S. Supreme Court.

2. I am a member in active good standing of the bars of:

a) the District of Columbia;

b) Illinois;

c) Virginia;

d) the U.S. Court of Appeals for the First Circuit; and

e) the United States District Court for the Eastern District of Virginia.

3. I am not currently, and have never been, subject to disciplinary proceedings in

any jurisdiction in which I have been admitted to practice.

4. I have not previously been admitted to this Court (pro hac vice or otherwise), and

have never had my admission to any court revoked for misconduct.

5. I have read and agree to comply with this Court's Local Rules.

/s/ Laura A. Seferian

Laura A. Seferian Dentons US LLP 1900 K Street NW

Washington DC 20006

laura.seferian@dentons.com

(202) 496-7339

Dated: June 12, 2020

CERTIFICATE PURSUANT TO LOCAL RULE 7.1(a)(2)

	I hereby	certify	that I	Defendant	has	conferred	with	Plaintiff	and	Plaintiff	assents	to	this
motion	١.												

/s/ Tony K. Lu
Tony K. Lu

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all parties as identified on the NEF on June 12, 2020.

/s/ Tony K. Lu
Tony K. Lu